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Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:	:
	: CASE NO. 21-10121/SLM
	:
	: HEARING DATE: 05/04/2021
	: @ 11:00 a.m.
	:
	: CHAPTER: 11 (Subchapter V)
American Limousine LLC	:
	: CERTIFICATION IN SUPPORT OF
	: NOTICE OF MOTION OBJECTING
	: TO PROOF OF CLAIM
	:
	: ORAL ARGUMENT WAIVED
Debtor(s)	:

Michael Fogarty, does hereby certify:

1. I am the President of the Debtor and the Debtor in Possession.

2. I have reviewed the Proof of Claim on Behalf of Joselito R. DeLa Cruz, Jeff Pangilinan for themselves all those similarly situated. (Exhibit A).

3. Paragraph 9 states that the claim is secured by a lien on property. It states that the basis for perfection is a Judicial lien filed in California.

4. The value of the property and the amount of the claim that is secured have been left blank, as has the amount of the claim that is secured.

5. The Debtor does not have any property in the state of California whatsoever. Upon information and belief, the creditor's judicial lien would only attach to property located in the State of California.


6. Additionally, the creditor has not identified any property to which its lien has attached. Nor the value of any such property.

7. Based on the above, we ask the claim be reclassified to be a general unsecured claim.

I hereby certify that the foregoing statements made by me are true; I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

3/22/21


Michael Fogarty, President
American Limousine LLC